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U.S. DISTRICT COURT
2025 JAN 31 PM 2:17
S.D. OF N.Y.W.P.

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January 29, 2025

Hon. Robert Lehrburger
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Letter to the Court with a Request for a Lawyer Pursuant to 42 U.S.C. § 2000e-5(f)(1)

Case Title: Lucio Celli v. New York City et al.

Case No.: 2024-cv-09743

Dear Magistrate Judge Lehrburger,

I am writing to respectfully request the appointment of legal counsel to represent me in the above-referenced case, filed pursuant to Title VII of the Civil Rights Act of 1964. Under 42 U.S.C. § 2000e-5(f)(1), the court has discretion to appoint an attorney for a plaintiff in a Title VII claim, and I believe my circumstances merit such an appointment.

I have made diligent efforts to obtain legal representation on my own but have been unsuccessful. Specifically, I contacted numerous attorneys but was either turned down or informed that they were unable to take my case at this time without even hearing facts. Additionally, I am financially able to hire private counsel.

I do not know if my case has merit or not. I believe, however, that an appointment would help us all. Although I believe I am capable of representing myself, the emotional aspect of the legal and procedural complexities of pursuing this matter in federal court, make it difficult for me to adequately represent myself. This is all compounded by my distrust of the system, which would include lawyers. Please note—I will pay if a Pro Bono lawyer were willing to take my case,¹ if the lawyer was willing to take the case and must have the knowledge that I have little trust and

¹ I know—Pro Bono and paying them, but I just cannot find a lawyer; who accepts at first and backs out after I tell them the rest.

of all facts. I want people to know certain events, then there is my fear of what has transpired since 2015.

Standard of Review:

In determining whether to grant an application for counsel, the Court must consider: "The merits of plaintiff's case, the plaintiff's ability to pay for private counsel, his efforts to obtain a lawyer, the availability of counsel, and the plaintiff's ability to gather the facts and deal with the issues if unassisted by counsel." Cooper v. A. Sargenti Co., Inc., 877 F.2d 170, 172 (2d Cir. 1989) (per curiam). As a threshold matter, in order to qualify for counsel Plaintiff must demonstrate that the claim had "substance" or "some chance of success." See Ferrelli v. River Manor Health Care Center, 323 F.3d 196, 204 (2d Cir. 2003) (quotation marks and citation omitted). In reviewing a request for counsel, the Court must be cognizant of the fact that volunteer attorney time is a precious commodity and, thus, should not grant a request for counsel indiscriminately. Cooper, 877 F.2d at 172. See Nieves v. N.Y.C. Dept. of Educ., 2024 U.S. Dist. LEXIS 233431, *2

Therefore, the "standard of Review" is my answer, Your Honor does not even need to give any thought towards, "if the case has any type of merit or not." I will file this letter as I already said that I was looking for lawyer in the statute, as I remembered the statute mentioned appointment of lawyer by the Court, which is discretionary. It took a while to find it, in my disorganized system, but I found it. I thought, for a moment, that I dreamt the fact that the statute had this provision, as I know lawyers, in civil proceedings, it not a right.

Most of my lawyers have never made any admission of collusion,² even though I thought it. Ms. Weingarten, however, with her zeal of covering up tracks, with her belief she is above the law, that she harms me. If Your Honor had a chance to glance at my rough pleadings, you have read that I emailed Ms. Weingarten and everyone, I documented everyone via emails and audios (if tech was on my side).

Furthermore, having legal representation would greatly benefit my mental health by alleviating the stress and anxiety that I have in the case with surrounding factors. It would also lessen the burden on those who receive my emails, as the emails are not professionals and provide me with no additional help or advantage. Irrespective of what I believe or feel, the truth

² Unlike Silverman, Kellman and Santana (Santana said "someone" a pure crackhead answer) who have admitted to me of collusion

is that having an attorney would allow me to pursue this matter with a clear focus and reducing the strain on those who have been emailing—just saying the truth. **HOWEVER**, this is not a matter to consider for the Court, as I searched for case law on the topic of “appointment of representation in civil cases with mental illness”—no luck.

I fully understand if Your Honor cannot appoint an attorney, but I respectfully ask the court to consider my situation and circumstances upon the request of which I make of the Court. My unsuccessful attempts to secure counsel, and the potential benefits of this appointment would have on both my mental well-being and my ability to effectively present my case in a meaningful manner.

The flipside, even if I were to truly qualify under the standard of review, the issue is: I would not trust any lawyer at this point. Ms. Weingarten, Judge Cogan, and Judge Engelmayer have ensured that I would argue with the lawyer, out of suspicion, towards any answer or tactic he or she would provide me. This is the underlying issue of why I have been turned down by numerous lawyers, as they are always interested.³

I do not want any lawyer to take on my case and then encounter my behavior, thanks to the interference by the Trinity of Evil, as this would not be fair to anyone or have the lawyer leave me during litigation, which is not fair to me. I always start with the facts of the basic claims and damages of which I have incurred. When they accept, I then tell them about the admissions by my previous lawyers with the Trinity and who I have emailed in this process— this is where they are no longer interested. It is better put the cards on the table.

Thank you for your time and consideration of this request. I am willing to provide any additional information the court may require.

Sincerely,

CC

Lucia
Chu
1/31/25

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³ This still does not mean, there is merit to the case.